



# EDUBASE

## Privacy Policy

EduBase Educational Services Limited Liability Company

Last revision: 29<sup>th</sup> August 2017

**EduBase Educational Services Limited Liability Company** (Registered seat: 1046 Budapest, Pálya street no. 24, 4th floor/20; company registration number: 01-09-284426; hereinafter referred to as: Service Provider), as data controller notifies the affected data subjects (hereinafter referred to as: Client) in details prior to the commencement of data management according to the present regulation (hereafter referred to as: Policy) about the facts of data management and the methods of complaint handling.

### 1. Background information

The Service Provider has taken the utmost care to ensure data protection. The Service Provider performs the processing of data according to the applicable Hungarian data protection laws and the present Policy. The Service Provider is a registered data controller in the record of Hungarian National Authority for Data Protection and Freedom of Information. (The registration number of database managed for sending newsletters to Clients is: NAIH-121257/2017; the registration number of database to be established for monitoring of consumer trends is: NAIH-121164/2017.)

The Service Provider processes personal data which come to its attention in the course of its activity according to Act CXII of 2011 on Informational Self-Determination and Freedom of Information, and according to the provisions of laws being referred to at certain services. The Service Provider pays particular attention to the confidential and secure management of personal data, and through technical and organizational measures, ensures the protection of personal data against unauthorized access, their unauthorized alteration, transfer, disclosure, deletion or destruction, as well as against accidental damage or destruction.

In the course of its activity, the Service Provider processes personal data which are provided by the Client or the person who is concerned with the processing of personal data – that is any natural person who is identified or can be identified according to any specific, personal data - given for the Service Provider when accessing the webpage [www.edubase.net](http://www.edubase.net) or its subpages, furthermore any other webpage which automatically directs the visitor to [www.edubase.net](http://www.edubase.net) or to any of its subpages (hereinafter referred to as: Webpage). The Service Provider's data management is based on the free and voluntary consent of the person concerned.

The Client, by using the Webpage or by concluding a contract with the Service Provider, agrees to the management of personal and other data by the Service Provider according to the present Privacy Policy, and to transfer them to persons designated in the present Policy with the purpose of data processing.

## 2. The management of user data and information requested by us

### 2.1. Personal data

The Policy is applicable to any and all personal data that is provided to us as part of the relationship with the Service Provider, and which is collected and processed by us. According to the terminology of the Policy “personal data” means any data connected to you from which your identity can be de facto or potentially, directly or indirectly determined (especially your name, address, telephone number, e-mail address, credit- and bank card number) and data resulted from such information.

The consent of minors under the age of 14 and the statement of consent of Users who are legally incapable shall be given by their legal representatives. Minors between the ages of 14 and 16 and Users whose legal capacity is limited are not allowed to give permission for data management without the prior consent of their legal representatives or their subsequent approval. The consent of minors over the age of 16 shall be considered valid without the valid permission or subsequent approval of their legal representative. The Service Provider is not able to validate the content of the statement given by the representative, and the Service Provider cannot check whether the representative is legally entitled to give such permission. Therefore the User (or his legal representative) shall warrant that the consent given meets the requirements. If the Services of the Service Provider are used it is implied that proper consent is given by the legal representative.

### 2.2. Collection of Client’s personal data

We collect personal data in the course of the use of our services about you which were given by you or we collected them about you when you used the services of our webpage. However, the Service Provider does not take responsibility for the use of your personal data by third parties for their own purposes in permitted cases.

You may find further information for such cases in the privacy policies of the respective parties. You may find information regarding the data transferred to external parties in section 3 below.

### 2.3. Information collected and processed by us:

- information about you;
- information about the services purchased by you;
- information referring to the device used by you;
  - the IP addresses of devices
  - display resolution of devices, operating system and type of browser used
  - type of device
  - geographical location
  - preferred language

- details of data generated by using the Service;
  - place and time of accessing the Service
  - the contents viewed during the use of the Service and the time of their viewing
  - the keyboard and mouse interaction carried out on the Webpage
  - your subscriptions, memberships, user rights, letters and searches within the Service
- mandatory data given during registration;
  - your full name
  - your email address
  - your gender
- data which may be disclosed voluntarily in the course of the registration;
  - date of birth
  - place and time of completion of studies
- details about your access and use of our Webpage and mobile applications; and
- the details of contacting us and our colleagues.

**By providing your personal data you consent the data management performed by the Service Provider according to the present Policy and to applicable laws and you give your explicit consent thereto, including the use of data by the Service Provider's employees according to the present Policy and their transfer to inland and abroad.**

We use your personal data for the following purposes:

(A) for providing Services or in order to enhance the purchase of products and services provided by external parties through our Webpage (all data belong here which are collected in the course of registration or during the process of purchase: Client's name, place of residence, nationality, gender, telephone number, e-mail address, date of birth);

(B) in order to provide customized Services, offers and reminders (for this purpose we use data for example your name, contact, and data about search history);

(C) for communication with you (for example: reminder e-mails, for sending notifications on possible outage of the services) (for this purpose we use the following data: your name, contact details);

(D) for communication with you in order to conduct client satisfaction surveys – this serves quality and service improvement, the development of Webpage performance, the evaluation of success of advertising campaigns and the personalization of services (for these purpose we use your name, contact details and the interaction history of the Service);

(E) in order to support other administrative purposes (including but not limited to accounting and invoicing, controlling, checking credit and other payment cards, filtering to prevent fraud – including searching in credit reporting systems and checking the validity of payment cards -, safety, protection, administrative and legal purposes and testing, maintaining and developing of the systems).

In order to avoid any misunderstanding, the Service Provider draws attention to the fact that, that we are entitled to use any data collected from you in an appropriate manner.

## 3. Transferring your personal data to external parties

3.1. In order to provide the smooth functioning of services and information the transferring of your personal data to external parties, for purposes set forth in the present Regulation and to the extent and the way necessary for the realization of these purposes, might be needed.

Your personal data may be transferred by us to external parties for the purposes set forth in the present Policy:

- to credit card companies and payment service providers in order to process transactions initiated through our webpage;
- to external parties who carry out surveys ordered by us among customers;
- to other external parties with whom we collaborate for data processing;
- for law firms and courts in order to enforce or apply the contracts concluded with you;
- to subcontractors may be used for providing the services provided upon the contract concluded with you;
- for governmental authorities, security forces (for police and regulatory authorities) if they ask for, and only according to legal requirements in order to protect our rights, the security of our clients, colleagues and devices.

3.3. Other external parties.

- In order to send letters to companies who carry out the electronic delivery of letters sent to you by us.

## 4. Safety

4.1. We take the proper technical and organizational measures in order to protect your personal data against accidental or unlawful destruction or accidental loss and alteration, as well as against unauthorized transferring or access – in particular in cases where the transfer of data via a network forms a part of data processing -, and also against all unlawful means of data processing. We devote special attention to the safe transfer of personal and financial data.

The data of this nature are transferred to the Service Provider's server from your computer with the use of fully encrypted channel.

4.2. By accepting the Privacy Policy the Client gives his or her explicit consent that the Service Provider is entitled to transfer the Client's personal data to third parties, for purposes set forth in the present Policy and to the extent and the way necessary for the realization of these purposes, even outside the European Economic Area.

Should we transfer data to countries outside the European Union in accordance with the present Policy, we may not guarantee that the protection of data will be performed according to EU data protection law. If you continue to use our services, and you give any personal data, you give your explicit consent to such transfer, storage and processing of your personal data outside your country of residence and the European Economic Area, including countries where local legislation gives you fewer rights.

## 5. Using your personal data for marketing and other purposes

5.1.

In the course of the use of our webpage your browser stores cookies on your device. Our objective is to ensure those who visit our website will find what they are looking for, and we would like to provide them with the most relevant marketing communication. In order to reach our goal we might use your data for analytical purposes, quality improvements, service development, to improve the webpage performance, to evaluate the success of our advertising campaigns and to customize our services to your demands. For these purposes information which is not suitable for establishing your identity (including but not limited the following: anonymous demographical data and data regarding online behavior) may be transferred to our contracting parties (for example to external service provider companies listed at section 3). In the course of the use of the service we store the data sent by the browser and the IT device used by you. Such data are transferred for external parties only in aggregated form and not being suitable for establishing identity.

### Technical data

The Service Provider automatically collects certain technical data in the course of each visit (as detailed below) which cannot be directly associated with the Client. However, in certain cases these technical data may be considered personal data. The Service Provider uses these technical data to the extent to which it is needed for the operation of the Webpage and its protection against attacks and abuses. Furthermore, the Service Provider uses the technical data in pseudonymized or anonymized forms for statistical purposes. The Service Provider always manages technical data separately from real, personal data.

Type of data	Purpose of data processing	Duration of storage
IP address	analyzing and monitoring incidents	5 years
User agent	identifying and fixing browser-specific errors	5 years

### The use of cookies

Besides the aforementioned, in order to enrich user-experience the Service Provider uses cookies as well. Cookies are sets of information consisting of letters and/or numbers which are sent by web servers to the Client's browser at the first visit of websites. With the help of cookies websites will subsequently recognize that the Client has already visited the site, thus they can provide personalized usage for the Client. Furthermore, cookies collect information about the use of the respective website. Websites often use cookies for storing data which operate uniformly at different parts of the website (for example personalized pages). Cookies also give the possibility not to register every time you visit a certain website.

The Service Provider uses the following cookies on its Webpage:

Type and name of cookie	Functioning of cookies	Lifespan of cookies
<i>persistent cookie</i> , user	with its help the system keeps the visitor logged in	30 days
<i>persistent cookie</i> , authenticator	authenticates trusted devices in case of 2FA	180 days

Type and name of cookie	Functioning of cookies	Lifespan of cookies
session cookie, cookies	it can be verified whether cookies are permitted	session

## Cookie stop

The Client may check and delete the cookies stored on his or her computer, and with the help of the web browser settings the Client may control the way these are used. You can get further information about this from the manufacturer or from the 'Help' function of your web browser. By disabling the cookies the functions of the Webpage will be restricted.

## Google Analytics

For website monitoring, the Service Provider uses Google Analytics. Google Analytics places cookies in the Client's browser. The data about visiting the website recorded in the cookies and the Client's IP address will be transferred to Google's servers and stored there. Google uses these data to evaluate the Client's website visiting habits.

Data transferred to Google are not suitable for establishing identity. You can read more about Google data protection principles here: <https://www.google.com/policies/privacy>

By accepting Privacy Policy the Client gives his or her explicit consent to the collection of technical data, to the use of cookies and Google Analytics and data collection related to it, furthermore to the transfer of data collected for the operation of Google Analytics to Google servers, in particular to the United States of America.

## Hotjar

The Service Provider monitors the data of activities performed on the Webpage by using Hotjar services. Hotjar uses these data to evaluate the Client's webpage visiting customs.

Data transferred to Hotjar are not suitable for establishing identity. You can read more about Hotjar data protection principles here: <https://www.hotjar.com/privacy>

By accepting Privacy Policy the Client gives his or her explicit consent to the collection of technical data, to the usage of cookies and Hotjar and data collection related to it, and furthermore to the fact that data collected for functioning Hotjar can be transferred to Hotjar servers, in particular to Malta, Ireland and the United States of America.

### 5.2.

We may send you special offers and other contents, if you have asked for them by subscribing to our newsletter. By subscribing to newsletters, or by giving your data as described above, you - given that you have been duly informed regarding all issues relating to data processing - give your explicit consent to receive direct marketing communication requests, including requests from the Service Provider or one of our contracting parties, furthermore to receive reminder letters about your activities related to the Services.

In order to send these direct marketing communication requests and letters about special offers we will use your following data: name and e-mail address. In order to send you reminder letters we will store and process the following data: name and e-mail address.

5.3. This consent is voluntary. You can unsubscribe at any time freely without any reasoning by clicking on the link in the newsletter, by changing the settings in your profile or in the letter sent to the Service Provider's registered seat.

## 6. Miscellaneous provisions

6.1. If you register on our webpage, we assume that you allow the processing of your personal data given during registration, and you do not have to give your data in the course of your subsequent activities.

6.2. We store your personal data and your contracts with the Service Provider in our system. If you want to ask information about any of your data stored by the Service Provider, the method of data processing or the legal person who process the data (if any), or if you wish the alteration or deletion of data, contact us at [info@edubase.net](mailto:info@edubase.net) or in letter sent to the Service Provider's registered seat.

6.3. With regard to the data processing activities falling under the scope of Data Protection Act you have the following rights and remedies: you have the right to ask for data about the method of data processing, as well as to ask for the rectification, deletion or blocking of data. If the relevant legislation enables this, you have the right to object data processing. In the unlikely case when your rights relating to processing of persona data is infringed, you may turn to the Hungarian National Authority for Data Protection and Freedom of Information – 1125 Budapest, Szilágyi Erzsébet fasor 22/C; telephone number: +36-1-391-1400; fax: +36-1-391-1410; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu) - , or to the competent courts.

### The rights and remedies of the data subject related to data management

The Service Provider ensures the possibilities provided by the law in particular the following:

- you may ask for information about management of your personal data;
- you may ask for the rectification of your personal data;
- you can ask for the deletion and blocking of your personal data with the exception of the mandatory data management.

The concerned may ask for information about the management of his or her personal data, furthermore may ask the rectification of his or her personal data, as well as the deletion and blocking of data with the exception of the mandatory data management using the email address [info@edubase.net](mailto:info@edubase.net) or by post. The Service Provider will send a written notification within the shortest time but not longer than 15 days.

If incorrect data is recorded, the Service Provider rectifies it if the valid and correct data is at its disposal.

The Service Provider deletes the personal data if:

- its management is unlawful
- the data subject requests so,
- it is imperfect or false,

and this situation cannot be lawfully remedied, given that deletion of data is not excluded by law, or the purpose of data management has ceased, or the duration of data storage has expired; or it has been ordered by the court or by the Hungarian National Authority for Data Protection and Freedom of Information.



The Service Provider blocks the personal data instead of its deletion which fall under the scope of deletion obligation if the Client requests so, or if it can be assumed based on the available information that deletion would harm the subject's legitimate interests. Personal data thus blocked may only be processed until the processing purpose exists, that excluded the deletion of personal data.

The person concerned may object to the processing of his or her personal data:

- If the processing or the transfer of personal data is only needed for data manager's compliance with legal obligation, or for validation of data controller's, data importer's or a third party's legitimate interest; except the case of mandatory data processing.
- If processing and transferring personal data occurs with the purpose of direct marketing, public opinion survey or scientific research and
- In other situations established by law.

The objection can submitted to the email- or postal address given above, which submission will be examined by the Service Provider within 15 days of its submission and the Service Provider will notify the affected person in writing. If the affected person does not agree with the decision or the data controller fails to make a decision within the above deadline, you may turn to a court within 30 days from the receipt of the decision or within 30 days of the last day of deadline. The person concerned with personal data management is entitled to know which data presentation he or she was subjected.

The Service Provider may give information about the recorded data upon the request of persons being entitled under the applicable law (and to the individuals affected by data management). Beyond the information obligation based on statutory obligation or on the subject's written consent the Service Provider does not give information about the registered person's personal data.

The Service Provider undertakes to transfer the Client's personal data and to link the separate data managements only if the Client has given his or her consent to it, or if this is allowed by law and the legal conditions are met for the management of all personal data.

The Service Provider does not publish the managed data, only if this is required by law.

6.4. Any amendment of Privacy Policy will be published on our website.

6.5. We will manage your personal data until that time which is necessary to meet the purposes presented above, or until the end of limitation period established by law. If the data is no longer required for the performance of the contractual purposes or it is inadequate thereto, we delete such data within 6 months - but not later than the termination of the contract - from the establishment of such circumstances.

6.6. For the sake of your comfort and information our Webpage may contain references directing to other sites. We emphasize that the owners and operators of these webpages are other companies and organizations who posses privacy policies different from ours. The Service Provider has no influence on information of these websites or on information, materials, products, services found through these websites and does not bear any responsibility for them.

The present Privacy Policy has been drawn up in Hungarian and English languages. In case of any discrepancy between the different language versions, the Hungarian language version shall prevail.

6.7. The present Privacy Policy entered into force on 29<sup>th</sup> of August, 2017.